AF/IRW

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Applicant: § §

Christopher J. Cormack et al. § Art Unit: 2176
§
Serial No.: 10/700,910 § Examiner: Quoc A. Tran
§
Filed: November 3, 2003 § Docket: ITL.1706US
§ P17675
For: Annotating Media Content §
With User-Specified Information § Assignee: Intel Corporation
§

Mail Stop **Appeal Brief-Patents**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Sir:

This reply brief is directed to the new issues raised in the Examiner's Answer.

Claim 16

In claim 1, stored media information is output based on an associated index file. In other words, the index file is used to output the media information which is different from any annotation. Then the claim requires receiving an annotation request at a point in the index file. Clearly, at a point in the index file refers to the fact that the play of media information follows the index file, with the index file determining which stored media information is to be played. In other words, there are three files. There is a file of the stored media information, there is the index file, and there is a file for the annotations. What gets modified in response to an annotation request is "the index file at the point at which the annotation request was received to reference the stored annotation information." The use of a three part data structure is nowhere suggested within the cited references.

Nelson is reasonably clear that the way the annotations are played is that the annotations are called up by markers within the media file itself. See Nelson at page 9, paragraph 69 ("For example, markers may be inserted into the stored video conference data in order to identify where certain annotations took place"). Thus, instead of using an index file, Nelson plainly puts markers right into the media file itself. Therefore, he teaches away from the claimed invention.

King teaches a structure in which media files are used as indicated at 100 in Figure 3 and annotations are used as indicated at 200 in Figure 3. The way the two are combined is by putting indices k2:k1:k0 and m2:m1:m0 to correlate the annotations to the media files. See King at column 6, lines 43-50 and Figure 3. In this way, he simply uses just a media file and an indexed annotation file.

The Answer also refers to Figure 9 of King. Figure 9 is completely consistent with Figure 3 and tells how to index the annotation file to refer back to the actual video file 904. In other words, like Nelson, King only uses two files, the video file and the annotation file. He does not use an index file that controls the play of the media file and which is also modified to index to the annotations.

Thus, in short, neither reference nor their combination teaches outputting stored media information "based on an associated index file." Neither reference uses an index file that controls the play of the stored media. Likewise, neither reference modifies such an index file at a point at which the annotation request was received to reference the stored annotation information, at least because neither reference uses an index file in the way claimed. The way claimed is to use the index file to control the play of both the media file and the annotation.

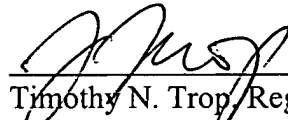Therefore, the rejection of claim 16 should be reversed.

Claim 17

With respect to claim 17, the material cited at column 3, lines 15-25 does not support the asserted points, namely, types of annotations that can be created, including freehand bit map drawings, text, and audio files. But even if there were different types of annotations, this is not what the claim calls for. Most certainly, what the claim calls for is asking for a type of the annotation "before the receiving and storing." Not only is this not set forth within the reference, but nothing in the material at page 21 *et seq.* provides any basis for believing that either reference teaches such a thing.

Therefore, it is respectfully requested that the rejections be reversed.

Respectfully submitted,

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